

BAILEY GLASSER LLP

1055 Thomas Jefferson
St. NW
Suite 540
Washington, DC 20007
Tel: 202.463.2101
Fax: 202.463.2103

Brian A. Glasser
bglasser@baileyglasser.com

December 6, 2021

Via Email and First Class Mail

The Honorable Michael B. Kaplan
United States Bankruptcy Court, District of New Jersey
Clarkson S. Fisher US Courthouse
402 East State Street, Courtroom #8
Trenton, NJ 08608

Re: LTL Management LLC, Case No.: 21-30589(MBK)

Dear Judge Kaplan,

On December 1, 2021, the TCC requested the deposition of Michelle W. Goodridge, former President of Old JJCI and current President of New JJCI. Since that time, the parties have met and conferred on at least four occasions and are making progress on resolving outstanding discovery issues related to our pending written discovery requests. Nonetheless, there are still a number of open issues, the most pressing of which is that Debtor has refused to make Ms. Goodridge available for a deposition.

Ms. Goodridge is not only the President of Old and New JJCI, but she signed roughly 90% of the documents in the 2021 Corporate Restructuring. The TCC wants to take the early deposition of Ms. Goodridge to assist in orienting it to the transaction and to allow it to better undertake the remainder of discovery in the short time available. Her position in the company and involvement in the transaction will allow the TCC to understand the basic timeline and facts and to then determine the universe of relevant documents, events, and custodians. The TCC has agreed to take Ms. Goodridge's deposition without the benefit of any documents having been produced so far in this contested matter. The TTC has also agreed that it will not recall Ms. Goodridge even after the receipt of any documents. Despite these terms, Debtor will not agree.

Ms. Goodridge is clearly a relevant witness in this matter. By refusing to produce her for a deposition, Debtor is inappropriately attempting to dictate who the TCC can and cannot depose and in what order. The TCC asks that the court direct Debtor to make Ms. Goodridge available for a deposition on Monday, December 13, 2021 at 10:00AM at the offices of Genova Burns, 110 Allen Rd., Suite 340, Basking Ridge, NJ 07920.

Sincerely,



Brian A. Glasser